

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE : CHAPTER 13
MARYANN MENKHAUS :
Debtor(s) : No. 19-17048 amc

DEBTOR'S RESPONSE TO THE MOTION OF DEUTSCHE BANK NATIONAL TRUST

COMPANY FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW, MARYANN MENKHAUS, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

- 1-7. DENIED. The averments contained in these Paragraphs consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.
- 8-9. DENIED. Debtor acknowledges she fell behind with post-petition mortgage payments due to lost income resulting from the current pandemic. However, Debtor believes she made recent payments that have not been credited. She is presently gathering receipts and will forward to Counsel. Debtor wishes to enter into a Stipulation to cure the remaining post-petition arrears.
10. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement.
11. DENIED.
12. DENIED. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied, and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

September 18, 2020

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato

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